

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA
CASE NO: 06-21790CA-01(21)

AG GROUP INVESTMENTS, LLC, a
Florida Limited Liability Company,

Plaintiff(s),

vs.

ALL REALTY ALLIANCE CORP., a
Florida Corporation, et al.,

Defendant(s).

DEPOSITION OF DETECTIVE EDWARD HILL
Pages 1 - 39

Thursday, September 30th, 2010
2:12 p.m. - 2:51 p.m.
20803 Biscayne Boulevard - Suite 300
Aventura, Florida

Stenographically Reported By:
ANGELA R. KEYES, FPR
Florida Professional Reporter

1 APPEARANCES
 2 On behalf of the Plaintiff(s):
 3 GINNIS & GROYSMAN, P.A.
 4 101 Northeast 3rd Avenue - Suite 1100
 5 Fort Lauderdale, Florida 33301
 6 (954)712-0505
 7 BY: ROMAN GROYSMAN, ESQUIRE
 8
 9 On behalf of G&G Property Investments, LLC, Oleg Firer
 10 and Karina Firer:
 11 MICHAEL I. BERNSTEIN, P.A.
 12 1688 Meridian Avenue - Suite 418
 13 Miami Beach, Florida 33139
 14 (305)672-9544
 15 BY: BRIAN G. WINGER, ESQUIRE
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1 Deposition taken before Angela R. Keyes, Florida
 2 Professional Reporter and Notary Public in and for the
 3 State of Florida at Large in the above cause.
 4 * * * * *

5 THE COURT REPORTER: Do you swear or affirm the
 6 testimony you are about to give will be the truth, the
 7 whole truth, and nothing but the truth?

8 THE WITNESS: Of course I do.

9 MR. WINGER: Let me just object before you start
 10 to this entire deposition. It is prejudicial to
 11 Mr. Firer and G & G Property Investments.

12 MR. GROYSMAN: Thank you for that.

13 THEREUPON:

14 DETECTIVE EDWARD HILL

15 having been first duly sworn, was examined and testified
 16 as follows:

17 DIRECT EXAMINATION

18 BY MR. GROYSMAN:

19 **Q. Sir, can you please state your name for the
 20 record.**

21 A. Detective Edward Hill.

22 **Q. And what do you do for a living, sir?**

23 A. Violent crimes, homicide investigations. Been so
 24 employed for the past 25 years now.

25 **Q. And you are a detective with which agency?**

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 5
 1 A. North Miami Beach.
 2 **Q. And before we proceed let me just introduce
 3 myself. My name is Roman Groysman and I'm the attorney
 4 for the plaintiff in this matter, the plaintiff being AG
 5 Group Investments, LLC.**

6 **Detective, I assume you have been deposed
 7 numerous times before; is that correct?**

8 A. Yeah.

9 **Q. A few times?**

10 A. That's fine.

11 **Q. And I'm sure you know the ground rules.**

12 A. Stop sending those checks because we don't cash
 13 them.

14 **Q. The \$7 witness checks?**

15 A. Yes.

16 **Q. Okay. I'm sorry. I will tell my paralegal.**

17 **Before we proceed, even though I'm sure you heard
 18 this a million times before, let me just lay some ground
 19 rules really quick. Obviously I'm going to ask you some
 20 questions here. Just going to ask you to respond
 21 affirmatively so Madam Court Reporter can take down your
 22 answers with a yes or a no or a sentence. Is that
 23 understood?**

24 A. Yes.

25 **Q. And if you need a break just let me know.**

1 A. I don't need a break.
 2 **Q. Is there any reason why your deposition should**
 3 **not be taken here today?**
 4 A. No.
 5 **Q. Okay. I am interested -- I would like to ask you**
 6 **a few questions about a company by the name of All Realty**
 7 **Alliance Corp.**
 8 A. Okay.
 9 **Q. Are you familiar with that entity?**
 10 A. I have heard that and I have seen that entity
 11 before.
 12 **Q. Okay. Did you ever have an occasion to**
 13 **investigate that entity?**
 14 A. Well, I investigated Natalia and Victor Wolf, and
 15 then I -- later during that investigation I found out they
 16 owned that real estate company, they were involved with
 17 that real estate company.
 18 **Q. Okay. So let me ask you this. You are aware of**
 19 **the fact that an individual by the name of Natalia Wolf**
 20 **was a principal of a company called All Realty Alliance**
 21 **Corp.?**
 22 A. Yes. She had a lot of companies under her.
 23 **Q. I'm specifically talking about All Realty**
 24 **Alliance Corp.**
 25 A. Yes.

1 Department. He said he gave money to the developer to
 2 build a house and they didn't do it, you know, and he has
 3 been on them for months. And I told him he need to go to
 4 Ocala. Well, he just happened to be here in North Miami
 5 Beach, so out of courtesy I met with him and he told me,
 6 oh, the real estate office is in North Miami Beach, but he
 7 gave them money in Ocala in their office where the
 8 transaction occurred.
 9 **Q. When you are saying he gave them money, who did**
 10 **this individual give money to supposedly?**
 11 A. To a Natalia Wolf. But he wrote a check to her
 12 company.
 13 **Q. Let me ask you a specific question. Do you have**
 14 **a way maybe afterwards when you come back to your office**
 15 **of determining the exact date that you came into physical**
 16 **contact with Ms. Wolf for the first time?**
 17 A. No, I don't, because everything I had was given
 18 to the FBI. We had like 40 something boxes of stuff.
 19 **Q. Including your notes?**
 20 A. Yeah. Everything was given to the FBI. I have
 21 here for you a copy of an offense incident report that our
 22 officers wrote, and all of the -- some of the alleged
 23 victims in there who turned out later in our
 24 investigation, found out they are not really victims.
 25 They made reports on how badly they were ripped off by

7

1 **Q. How did you come about investigating Ms. Wolf?**
 2 A. There was a guy who came -- called in a complaint
 3 that he had bought some property in Ocala area, Citrus
 4 Springs, and apparently the -- Natalia Wolf real estate
 5 office was in North Miami Beach.
 6 **Q. Okay. And what year was that that you began to**
 7 **investigate Ms. Wolf?**
 8 A. 2006.
 9 **Q. Okay. Do you remember the exact month that you**
 10 **for the first time began to investigate Ms. Wolf?**
 11 A. It was in October, around October. Around the
 12 18th of October, or 19th.
 13 **Q. And did you ever come into physical contact with**
 14 **an individual by the name of Natalia Wolf?**
 15 A. Yes, I did.
 16 **Q. Do you recall the exact date when you came into**
 17 **contact for the first time with a Ms. Natalia Wolf?**
 18 A. You know what, I don't have exact date. I know
 19 it was on a Friday. Either it was the 6th -- October the
 20 6th or either October the 13th. It's one of those days.
 21 Because this gentleman came -- actually it wasn't in our
 22 jurisdiction because it was -- it should have been Ocala.
 23 And I understand later there was an investigator up there
 24 handled it.
 25 But he called us, North Miami Beach Police

9

1 Natalia Wolf also.
 2 **Q. Okay. And let me ask you this, sir. The date of**
 3 **this incident investigation report is what exactly? Take**
 4 **a look for me.**
 5 A. October the 18th.
 6 **Q. Of which year?**
 7 A. '06, 2006.
 8 **Q. And working your way backwards, are you able to**
 9 **tell me whether you would have met Ms. Wolf for the first**
 10 **time prior to the date of this incident report?**
 11 A. Yeah. Around the 6th -- either October the 6th
 12 or October the 13th as I recall. I don't remember the
 13 exact date because when he called me there was no report.
 14 I told him it's not in our jurisdiction.
 15 **Q. So are you fairly confident that at the latest**
 16 **you would have met Ms. Wolf for the first time would have**
 17 **been something like October 13th, 2010? Is that a fair**
 18 **statement?**
 19 MR. WINGER: 6th.
 20 A. Either the 6th or the 13th as I recall. That's
 21 2006.
 22 BY MR. GROYSMAN:
 23 **Q. I understand, sir. With October 13th technically**
 24 **being the latest date that you would have met her; is that**
 25 **correct?**

1	A. Yes, I believe so.	1	Q. And is it your testimony today that shortly after that complaint was made to you by this individual Ms. Natalia Wolf fled -- physically fled the state of Florida?
2	Q. But definitely prior to October 13th, the date of this incident report?	2	A. Yes.
3	A. Yeah. Because the report was filed later on.	3	Q. After the preliminary investigation?
4	Q. After the preliminary investigation?	4	A. Yes. After they had already deliberately fled and left. That's what I recall.
5	A. Yes. After they had already deliberately fled and left. That's what I recall.	5	Q. Okay. So let me ask you this, sir. At the time this incident report was made, October 18th, 2006 is it or --
6	Q. Okay. So let me ask you this, sir. At the time this incident report was made, October 18th, 2006 is it or --	6	A. Yeah. Because the report was filed later on.
7	A. Yeah. Because the report was filed later on.	7	Q. Okay. And you know this from personal knowledge?
8	Q. Okay. And you know this from personal knowledge?	8	A. Yeah -- Well, yeah, I was there at the house.
9	A. Yeah -- Well, yeah, I was there at the house.	9	You are talking about 2006. Best I can recall I went to her house -- no, her office first and we saw the doors were open and papers were all over the place. So then we went to her residence and her residence we went in the rear door because the people saying that -- some people were leaving the office. They was taking -- There were people walking out with computers and everything, you know.
10	Q. Okay. And you know this from personal knowledge?	10	And so they said that she -- we needed to go to her house because she may be deceased. Somebody said that, you know, because some bad people were looking for her. So we go to her house and the front door was locked. We walk around; you can see in her sliding glass door. You see paper and clothes and stuff strewed about
11	A. Yeah -- Well, yeah, I was there at the house.	11	the floor.
12	Q. Okay. And you know this from personal knowledge?	12	So the back door was open. We go in, we check the house and make sure nobody is there, you know. And there were a lot of clothes and a lot of TVs -- a lot of stuff still left there like somebody just packed a bag and left in haste. There were dozens of champagne bottles in the kitchen area.
13	A. Yeah -- Well, yeah, I was there at the house.	13	Q. Do you remember the names of the individuals who first contacted you and complained about Ms. Wolf's business activities?
14	Q. Do you remember the names of the individuals who first contacted you and complained about Ms. Wolf's business activities?	14	A. No, I don't, because -- I referred them to Ocala. It was a gentleman. You know what, I might have a -- Wait a minute. Let me see something here. Because that guy -- I might have referred him to -- I don't think he filed a police report either, not with us. I don't remember that guy name.
15	A. No, I think she was gone by then. By the time this guy files the report, I think she left.	15	MR. GROYSMAN: Give me one second. Can we just ask you to make a copy of the police report while I'm looking for --
16	See, if I had a calendar to go back -- I know the guy came to my office either the 6th -- because she gave him a check on a Friday. I believe the 6th or the 13th had to be a Friday. And that following Monday, that's when she was gone.	16	THE COURT REPORTER: Sure. No problem.
17	He tried to cash the check on Monday and she told him just wait until the money in the bank. So he went to the bank on Monday and the check was no good. He called us and we went out to her property and she was gone.	17	THE WITNESS: No, no, you can have it.
18	He tried to cash the check on Monday and she told him just wait until the money in the bank. So he went to the bank on Monday and the check was no good. He called us and we went out to her property and she was gone.	18	THE COURT REPORTER: Do you need another copy though?
19	Q. So let me ask you a couple of questions here just so we can have a clear record. Is it your testimony today that sometime in October 2006 you were contacted by an individual complaining about the activities or the alleged activities of Ms. Natalia Wolf?	19	MR. GROYSMAN: You want when you order the --
20	A. Yes.	20	MR. WINGER: A copy comes with the transcript so

11	Q. So let me ask you a couple of questions here just so we can have a clear record. Is it your testimony today that sometime in October 2006 you were contacted by an individual complaining about the activities or the alleged activities of Ms. Natalia Wolf?	13	Q. So let me ask you a couple of questions here just so we can have a clear record. Is it your testimony today that sometime in October 2006 you were contacted by an individual complaining about the activities or the alleged activities of Ms. Natalia Wolf?
12	A. Yes.	14	A. Yes.
13	Q. Okay. And you know this from personal knowledge?	15	Q. Okay. And you know this from personal knowledge?
14	A. Yeah -- Well, yeah, I was there at the house.	16	A. Yeah -- Well, yeah, I was there at the house.
15	You are talking about 2006. Best I can recall I went to her house -- no, her office first and we saw the doors were open and papers were all over the place. So then we went to her residence and her residence we went in the rear door because the people saying that -- some people were leaving the office. They was taking -- There were people walking out with computers and everything, you know.	17	And so they said that she -- we needed to go to her house because she may be deceased. Somebody said that, you know, because some bad people were looking for her. So we go to her house and the front door was locked. We walk around; you can see in her sliding glass door. You see paper and clothes and stuff strewed about
16	And so they said that she -- we needed to go to her house because she may be deceased. Somebody said that, you know, because some bad people were looking for her. So we go to her house and the front door was locked. We walk around; you can see in her sliding glass door. You see paper and clothes and stuff strewed about	18	the floor.
17	So the back door was open. We go in, we check the house and make sure nobody is there, you know. And there were a lot of clothes and a lot of TVs -- a lot of stuff still left there like somebody just packed a bag and left in haste. There were dozens of champagne bottles in the kitchen area.	19	So the back door was open. We go in, we check the house and make sure nobody is there, you know. And there were a lot of clothes and a lot of TVs -- a lot of stuff still left there like somebody just packed a bag and left in haste. There were dozens of champagne bottles in the kitchen area.
18	Q. Do you remember the names of the individuals who first contacted you and complained about Ms. Wolf's business activities?	20	Q. Do you remember the names of the individuals who first contacted you and complained about Ms. Wolf's business activities?
19	A. No, I don't, because -- I referred them to Ocala. It was a gentleman. You know what, I might have a -- Wait a minute. Let me see something here. Because that guy -- I might have referred him to -- I don't think he filed a police report either, not with us. I don't remember that guy name.	21	A. No, I don't, because -- I referred them to Ocala. It was a gentleman. You know what, I might have a -- Wait a minute. Let me see something here. Because that guy -- I might have referred him to -- I don't think he filed a police report either, not with us. I don't remember that guy name.
20	MR. GROYSMAN: Give me one second. Can we just ask you to make a copy of the police report while I'm looking for --	22	MR. GROYSMAN: Give me one second. Can we just ask you to make a copy of the police report while I'm looking for --
21	THE COURT REPORTER: Sure. No problem.	23	THE COURT REPORTER: Sure. No problem.
22	THE WITNESS: No, no, you can have it.	24	THE WITNESS: No, no, you can have it.
23	THE COURT REPORTER: Do you need another copy though?	25	THE COURT REPORTER: Do you need another copy though?
24	MR. GROYSMAN: You want when you order the --	25	MR. GROYSMAN: You want when you order the --
25	MR. WINGER: A copy comes with the transcript so	26	MR. WINGER: A copy comes with the transcript so

1	I don't need one right now.	1	those dates is the date that she gave this gentleman a
2	THE WITNESS: I don't remember that guy name. He	2	check. It had to be that week of, maybe a Monday or
3	never filed a report with us.	3	Tuesday. I don't have a calendar that far back. Do you
4	Keep in mind now, technically it wasn't our	4	follow what I'm saying?
5	jurisdiction so we didn't really initiate anything	5	Q. Okay. I understand.
6	because it happened in Ocala area.	6	A. And I gave you those two dates. I'm not certain
7	MR. GROYSMAN: Yeah, I understand.	7	which date it is. But either that Monday or Tuesday I
8	BY MR. GROYSMAN:	8	went over there out of courtesy. Because he wasn't even
9	Q. So the bottom line is sometime in the early of	9	in town. It was the phone call he made.
10	October 2006 you were contacted by an individual or	10	(Mr. Groysman looks at calendar.)
11	individuals who were complaining about Ms. Natalia Wolf's	11	Q. We are dealing with October, right?
12	business activities; is that correct?	12	A. The 6th, yes.
13	A. Correct.	13	Q. There we are. Looks like the 13th was a Friday.
14	Q. You then went out to meet with Ms. Natalia Wolf	14	A. Yep, told you it was on a Friday.
15	physically; is that right?	15	Q. The 6th was a Friday as well.
16	A. Yes.	16	A. Okay. There you go. It had to be one of those
17	Q. And how soon after that call -- the complainant's	17	days. Had to be on a Friday. And I would never write a
18	call did you go out there to meet with Ms. Wolf	18	report because it wasn't our jurisdiction. I referred
19	physically?	19	him. But I know it had to be one of those days.
20	A. Prior to the 6th or the 13th, one of those dates.	20	Q. So the 6th and 13th would have been when the
21	Q. Of October 2006?	21	complaining victim would have contacted you for the first
22	A. Of October 2006, which was on a Friday, one of	22	time?
23	those dates. He came in probably that -- either one of	23	A. No.
24	those two weeks on like a Monday or a Tuesday.	24	Q. No. That's when she would have given him the
25	Q. He being who?	25	check?
15		15	
1	A. The gentleman who was complaining about his	1	A. She gave him a check and told him to hold it, you
2	property in Citrus, that she took a check and he paid her	2	know, and don't cash it because the money not in the
3	money and she didn't construct it.	3	bank.
4	And that particular gentleman asked me -- and out	4	Q. Oh, I see.
5	of courtesy, I went -- dropped what I was doing and went	5	A. And so he didn't go that Friday, he went that
6	out to the office to talk to her.	6	Monday. She told him to hold it until Monday, but Monday
7	Q. Okay. You went out to her business office?	7	they were gone. And he went to the bank and they said
8	A. Her business office in North Miami Beach.	8	there is no money in the account.
9	Q. I'm sorry. Let's speak one at a time so the	9	Q. And he contacted you before she gave him the
10	record is clear.	10	check?
11	Where was that business office located? Do you	11	A. He initially contacted me on the phone either one
12	know?	12	of those dates - the week of, like a Monday or Tuesday via
13	A. It's in the Eastern Shores area off of 163rd	13	telephone, and then I eventually spun out and talked to
14	Street. Probably like 34 something. I don't know the	14	her and she said, oh, I will just give him his money
15	exact address. 34 so and so on Northeast 163 Street.	15	back. So everybody was happy.
16	Q. Let me actually show you a picture. I don't know	16	Q. Okay. Then you said you went physically looking
17	if this will refresh your recollection. Does this look	17	for her at her house in Eastern Shores?
18	like the gentleman who contacted you?	18	A. Yeah. Because he told me on Monday -- that
19	A. No.	19	Monday, I don't know what time in the day - maybe before
20	Q. No. Must be another one.	20	lunch - he say, hey, this check is no good.
21	A. It was a younger guy.	21	Q. Bounced?
22	Q. All right. So you went out there sometime around	22	A. And I went to her office -- No, they didn't cash
23	October 13th, 2006 to physically meet with Ms. Wolf in her	23	it. He went straight to the bank. And he say he went to
24	business office?	24	her office and when he got in the office they said people
25	A. No, no, no. The 6th and the 13th, either one of	25	were walking in and out of there with stuff. She was

1	gone.	1	would think somebody was still living there.
2	Q. Do you remember roughly when would have been the	2	Q. But was anybody living there?
3	first time that you would have gone to Ms. Wolf's private	3	A. Well, I talked to the neighbors. They were there
4	residence to search for her?	4	the night before they told me.
5	A. Yeah. That Monday -- I went to the house that	5	Q. Okay.
6	Monday. Either the 6th or the 13th was a Friday.	6	A. And far as they know they didn't know they had
7	Q. So that would have been either on Monday the 9th	7	left.
8	or Monday the 16th?	8	Q. Were the Wolfs there the day you visited the
9	A. Roughly, yeah. It was one of those days.	9	house?
10	Q. Of October 2006?	10	A. No. No, sir.
11	A. Correct.	11	Q. Not a Ms. Natalia Wolf?
12	Q. And what did you find at Ms. Wolf's house over	12	A. No.
13	there in Eastern Shores?	13	Q. Not a Mr. Victor wolf?
14	A. Well, the house looked vacant, I mean, when you	14	A. No, sir.
15	first walk up. We went around the rear, and you can look	15	Q. Did you find anybody in the house, any living
16	in and it still was fully furnished. The back door was	16	being?
17	ajar and we went inside. We saw champagne bottles all	17	A. No.
18	over the place and we saw clothes.	18	Q. What about thereafter, did you continue to look
19	Q. When you say we, you went there by yourself?	19	for Ms. Wolf?
20	A. No, me and Sergeant Gary Kogan, because he is	20	A. Yes.
21	Russian.	21	Q. And were you able to find her?
22	Q. Gary Kogan?	22	A. No.
23	A. Yeah. In case we run into somebody, language	23	Q. Okay. So after your first visit to Ms. Wolf's
24	barrier, we know we cover our bases. So we went in there	24	house in Eastern Shores, ever since that date have you
25	and we didn't see her or nobody, because somebody was	25	been able to locate Ms. Wolf's physical location?
19	saying she live around the corner when we was at her	1	A. No. Or Mr. Wolf.
2	office. We didn't know that. And they said it was some	2	Q. And do you know whether Ms. Wolf is currently in
3	people, real bad people looking for her.	3	the continental United States?
4	Q. Do you know if Sergeant Kogan would have any	4	A. No. Last I heard she caught a Delta flight to
5	notes on the dates or --	5	New York, from New York to Germany. That was in 2006.
6	A. No. He didn't really get involved. I request he	6	Q. I don't know if you know anything about this, but
7	go to the house with me in case they were there and they	7	do you know if there was a forwarding address left at the
8	spoke Russian. And that's all he did. He went to the	8	Eastern Shores residence for Ms. Wolf?
9	house with me. We went and checked the house and then he	9	A. No, I don't know anything about that. It was?
10	went back to the station because the house was empty so we	10	Q. No, I'm asking you.
11	left.	11	A. Oh. I doubt it. If it was we need to have it.
12	Q. So is it fair to say that what you are saying is	12	Q. Yeah. If there was you would have found them,
13	that it would have been either Monday -- looking at this	13	right?
14	calendar would have been either Monday, October the 9th or	14	A. We want to send her a birthday card.
15	Monday, October the 16th that you visited Ms. Wolf's	15	Q. Let me ask you this. To the best of your
16	residence in Eastern Shores and found that residence to be	16	knowledge is Ms. Wolf a fugitive?
17	vacant?	17	A. Oh, absolutely.
18	A. Best I can recall, yes.	18	Q. Okay. Is she being sought after? Is she a
19	Q. Okay. And did you find anybody living at the	19	person of interest to law enforcement?
20	residence in Eastern Shores on 167th Street?	20	A. Yes.
21	A. No. No. The house was fully -- You would think	21	Q. For what purpose?
22	someone lived there. The house was fully furnished. They	22	A. For what purpose?
23	had a nursery with a crib in it. Everything was still	23	Q. Yeah. Why is she being --
24	there. Some clothes -- You see some clothes on the floor,	24	A. For this Ponzi scheme, grand theft.
25	kitchen had food and champagne bottles all over it, so you	25	Q. Okay. Which law enforcement agencies are looking

1 **for Ms. Wolf?**

2 A. Well, the federal government is looking for her
3 now because the jurisdiction was too much for local. I
4 don't know if Ocala is still looking for her. I'm certain
5 they got warrants out for her too.

6 **Q. Can you give us an idea of what exactly Ms. Wolf
7 is suspected of having committed, if anything?**

8 A. I can tell you what she did, not what she is
9 suspected of.

10 **Q. Okay.**

11 A. She scammed people. She did a Ponzi scheme. She
12 would -- and I know for a fact she paid X amount of
13 thousands of dollars for lots, 500 lots in Ocala. She did
14 it out of her real estate office here. And she sold those
15 lots to several individuals, gave counterfeit deeds, and
16 she recorded it.

17 If she sold it to ten people, the tenth person
18 got recorded. The other people -- nine got fake deeds or
19 deeds with stamps on them. And those individuals wouldn't
20 know until they didn't get their tax bill. So there had to
21 be a concerted effort from December until October to do
22 all that sales and transactions, because in November you
23 get a tax bill.

24 And it was really consistent and funny that they
25 left around that time in November, because taxes started

1 time those nine people -- She really retained the actual
2 deed. They thought they had a deed. On the tenth person
3 she sold it to them and then she would eventually go back
4 to that tenth person and try to give them \$5,000 more than
5 what they paid for it to get it back from them. Some
6 people sold it back to her, some people didn't.

7 **Q. Okay. And to the best of your knowledge do you
8 know whether Ms. Wolf engaged in this type of activity
9 through or by a related entity called All Realty Alliance
10 Corp.?**

11 A. Yes. And Sky Group -- Sky Development Group.

12 **Q. In other words, Ms. Wolf operated through a
13 number of different incorporated entities?**

14 A. Yes.

15 **Q. Do you know an entity by the name of G & G
16 Property Investments, LLC?**

17 A. Yes. I have seen documents with her name on that
18 tied in with that same company. And I had like -- we had
19 like 40 boxes of documents that now has been given to the
20 FBI. I have seen agreements with G & G where they were
21 both on the same line buying other properties or doing
22 other things.

23 **Q. In other words, to the best of your knowledge
24 based on your investigation you believe that Ms. Wolf and
25 G & G Property Investments, LLC were in business together?**

23

25

1 coming out and people already start calling, hey -- and
2 people had already start calling and saying, hey, I
3 haven't got nothing on my taxes. And that's how things
4 start unraveling. And they say, whoa, you don't own the
5 property. And the clerk's office said so and so owns the
6 property. And then everybody start -- look at all these
7 victims in here.

8 **Q. Let me ask you this way. Is Ms. Wolf suspected
9 of having sold property to people -- the same property
10 multiple times?**

11 A. Yes. I even had individuals tell me that she
12 called them back to buy the property back from them at a
13 \$5,000 difference, you know.

14 **Q. In other words, Ms. Wolf sold individuals
15 property that she really did not even own?**

16 A. No, she owned the lots.

17 **Q. Okay.**

18 A. And she sold them. She got a loan from the bank,
19 and she sold them to let's say ten individuals. The tenth
20 person she recorded.

21 **Q. She would sell the same lot to ten different
22 individuals?**

23 A. Yes.

24 **Q. And would give them -- most of them fake deeds?**

25 A. Fake deeds, fake deeds, yeah. And at the same

1 A. Well, I have seen documents. If they were true
2 documents I don't know. I just seen what we found in the
3 office.

4 **Q. Did you ever -- I don't know if you were involved
5 in this. Did you ever take a look at the chain of
6 recorded instruments that were recorded on the house in
7 Eastern Shores in which Ms. Wolf left? Did you ever look
8 at the title of that particular house?**

9 A. I didn't look at the title, but I think the State
10 of Florida did when they arrested Oleg at the closing.

11 **Q. You mean Oleg Firer?**

12 A. Yeah. When he got arrested for that closing,
13 But I do know for a fact during the course of the
14 investigation making phone calls we found out it was like
15 maybe three or four people had liens on that property.
16 But not only that, there was a property in Sunny Isles, a
17 condo that Natalia Wolf had, and apparently she said she
18 had a lien -- somebody had a lien on it for \$300,000.

19 And that person said that he never gave her that
20 money and he wanted to file a complaint against her too.
21 And she had a lien on the property and had like two or
22 three different liens on it.

23 **Q. In other words, Ms. Wolf had a lien on property
24 even though the title owner did not owe her any money?**

25 A. Yeah. And the girl who name was on the title,

1	she was being sought by some law enforcement and she fled	1	Saturday that Sunday -- that Monday when I went to her
2	the country.	2	house. That previous night she was there. That morning
3	Q. It was a Russian girl?	3	she fled.
4	A. Yeah.	4	Q. I'm not asking the question properly. As far as
5	Q. Do you know anything about Ms. Wolf having deeded	5	you know prior to October 18th, 2006 Ms. Wolf was no
6	away the property that she resided in to G & G Property	6	longer in the state of Florida physically; is that
7	Investments, LLC?	7	correct?
8	A. I don't know anything about her doing that, no.	8	A. No, not to my knowledge. Because I didn't call
9	But I understand she deeded the property to somebody.	9	the airport. I don't know. I was told she fled.
10	Q. Anybody ever complain to you about the fact after	10	Q. Okay. But as far as you know she -- prior to
11	she deeded away the property she continued to execute	11	October 18th, 2006 she no longer resided in her house in
12	mortgages on the property even though she didn't own it	12	Eastern Shores?
13	anymore?	13	A. Yeah, correct.
14	A. See, I didn't find out about the mortgage on the	14	Q. Okay. So is it fair to say that to your
15	property until after she fled because I never knew she	15	knowledge she moved out of that Eastern Shores house prior
16	lived in a house around the corner.	16	to October 18th, 2006?
17	Q. But what I'm asking is did anybody come and	17	A. Yes.
18	complain to you and say -- or I don't know if you were	18	Q. Okay. And since that date of October 18th, 2006
19	involved in that investigation at all. Did anybody	19	to the best of your knowledge Ms. Wolf has not been -- Let
20	complain to you about the fact that even though she	20	me rephrase that.
21	already deeded away the property she continued to mortgage	21	To the best of your knowledge currently she is
22	the property?	22	not in the state of Florida?
23	A. And I remember that vaguely. As I was calling	23	A. Correct.
24	the different lienholders that's how I found -- I talked	24	Q. Okay. And you tried to locate her physically
25	to a guy. Could his name be Steve?	25	after October 18th, 2006 and have not been able to do so;
		27	29
1	Q. Would it be Steve Wolberg?	1	is that correct?
2	A. Yeah, yeah, Steve Wolberg. I talked to him. He	2	A. Correct.
3	was an attorney or something for some company.	3	Q. And you have exhausted all means at your disposal
4	Q. G & G Property Investments?	4	in trying to locate her physical -- current physical
5	A. Oh, that's who it is? Well, he complained too.	5	address and location?
6	Q. About what?	6	A. Correct.
7	A. He said that something dealing with that	7	Q. And still you have been unable to do so?
8	property. Something was wrong or something dealing with a	8	A. Correct.
9	hotel that she quit-claimed to herself.	9	Q. Do you know anything about an individual by the
10	Q. That's a different piece of property.	10	name of Willard Geller?
11	A. Oh, okay.	11	A. No.
12	Okay. But I talked to him and I think he was --	12	Q. What about a Gerald Geller?
13	you know, I can't remember. I don't remember it because	13	A. No.
14	everything I had I gave -- turned over to the FBI. But I	14	Q. What about -- You mentioned you believe you spoke
15	know somebody was complaining because she owed -- she had	15	to a Mr. Steven Wolberg.
16	a lot of liens on that property.	16	A. No, I spoke to him before.
17	Q. Okay. So let me -- Okay. Just for purposes of	17	Q. You spoke to him before that. Did you physically
18	the record, going back to this, how certain are you that	18	meet Mr. Wolberg?
19	Ms. Natalia Wolf fled the state of Florida prior to	19	A. No.
20	October 18th, 2006?	20	Q. He called you?
21	A. How certain am I?	21	A. He called, because apparently there was a hotel
22	Q. Yeah.	22	in Hollywood that she deeded over to herself or quit-
23	A. Well, I don't know where she was. I just know	23	claimed to herself and he had a concern about that.
24	she wasn't in the house. I was told by a reliable source	24	Q. Do you know an individual by the last name of
25	later on that she caught a plane that next day on that	25	Tesoriero?

1	A. No, I don't remember that.	1	Q. How about an individual by the name of Oleg Firer? You ever met that individual before?
2	Q. What about a Robert Kulikowski?	2	A. Yeah, I met him.
3	A. I don't remember that name either.	3	Q. Under what circumstances?
4	Q. What about a Carol Kay?	4	A. Well, I was advised by the Assistant State
5	A. No, I don't remember.	5	Attorney's Office to take him in custody because there was
6	Q. What about an entity by the name of -- bear with	6	a warrant in the system for him. And apparently he was
7	me, let me look up the name -- Noril Realty, Inc.? Do you	7	involved with this house that Natalia used to live in, and
8	know an entity by that name?	8	somehow he was getting -- trying to do a mortgage on that
9	A. Who?	9	house for like \$3,000 I believe -- \$3 million. And I
10	Q. Noril, N-o-r-i-l, Realty.	10	don't know who found out about that, but somebody said
11	A. No, I don't remember that.	11	they were doing a closing and it was conveyed to Aventura
12	Q. And an attorney by the name of Donovan, last name	12	and Aventura didn't want to get involved. So I contacted
13	Donovan.	13	the State Attorney's Office and Mr. Bill Kastruski
14	A. No, I don't remember that.	14	(phonetic), Bill K., he immediately got involved because
15	Q. Did you ever come into contact with an attorney	15	that deal didn't look good. And the closing was supposed
16	by the name of Ira Shapiro?	16	to happen. And I don't know. Bill K. did that.
17	A. Ira Shapiro. That name sounds real familiar.	17	Q. You were the physical arrest officer? You
18	Ira Shapiro. I wonder if I ever met him. But I remember	18	physically arrested Mr. Oleg Firer?
19	his name. He was in -- He has an office in North Miami	19	A. Yes.
20	Beach.	20	Q. During that arrest did he make any statements to
21	Q. He was an attorney for G & G Property	21	you?
22	Investments, LLC.	22	A. Well, he didn't know what was going on.
23	A. I know how I know him now. I had a homicide case	23	Q. Meaning?
24	and I had my victim's mother, she like 67 years old. Her	24	A. Well, he didn't know why I was arresting him.
25	son was murdered, and that's all -- he took care of her.		

31		33	
1	She was refinancing her condo or selling her condo to some	1	Q. Oh, he didn't know why you were arresting him?
2	Russian people in Sunny Isles, and Ira Shapiro, somehow he	2	A. No. I told him there was a warrant in the system
3	was the closing agent.	3	for his arrest.
4	And I knew of his name from being with this	4	Q. And that is your only physical contact with
5	company, you know. And we had -- I had to pay close	5	Mr. Firer?
6	attention to him, which I'm glad I did because he was	6	A. Yes.
7	getting ready to rip her off.	7	Q. Okay. Do you know an attorney or former attorney
8	Q. Who, Ira Shapiro?	8	by the name of Steven Goldstein?
9	A. Yeah. He was overcharging her for something, and	9	A. No. I heard his name before also.
10	the attorney who was helping the lady caught that. And he	10	Q. How about an individual by the name of --
11	said, oh, yeah, I will write a check. He wrote the lady a	11	actually a company by the name of Trans-State Title?
12	check for the difference.	12	A. Trans-State Title?
13	Q. How much was it?	13	Q. Right.
14	A. I don't remember. I don't remember.	14	A. No, I don't remember that.
15	Q. Talking about a couple hundred or couple of	15	Q. What about Fortune Mortgage?
16	thousand?	16	A. I don't remember that one either.
17	A. Maybe a couple of thousand. But, you know, he	17	Q. What about an individual or mortgage broker by
18	should -- Is he still in business?	18	the name of Leon Atemnorod?
19	Q. Um-hmm.	19	A. Never heard of that name.
20	A. Oh, geez.	20	Q. What about a Felix Vakhovsky?
21	Q. How about an individual by the name of Leon	21	A. I have heard his name before.
22	Goldstein? Are you familiar with that individual?	22	Q. But you never investigated him or met him?
23	A. I have heard that name in this case before.	23	A. No.
24	Q. But you never investigated him?	24	Q. So the bottom line is, detective, that you had a
25	A. No.	25	limited initial role in investigating this matter and then

1 **you transferred all the files to the federal authorities**
 2 **because it became a federal matter?**
 3 A. Yes.
 4 MR. GROYSMAN: All right. Thank you very much.
 5 I have no further questions.
 6 THE WITNESS: That's it?
 7 MR. WINGER: Just ask you a couple of questions,
 8 just a few.
 9 THE WITNESS: I thought you objected.
 10 MR. WINGER: They will be easy. It will be
 11 painless.

12 CROSS EXAMINATION

13 BY MR. WINGER:

14 **Q. My name is Brian Winger and I am representing the**
 15 **Firers and G & G Properties in this case.**

16 **Have you ever heard of Pinnacle Three**
 17 **Corporation?**

18 A. Pinnacle Three? I don't remember.

19 **Q. Did you actually perform an investigation into**
 20 **Oleg Firer or were you just told by the State Attorney's**
 21 **Office to take him into custody?**

22 A. I didn't do an investigation. What happened is I
 23 got a phone call that that house was being closed on,
 24 somebody called, someone of interest -- that have interest
 25 in the house. And we found out when the closing was going

1 A. Are you kidding me? I'm really supposed to
 2 remember that?
 3 **Q. I mean in your experience.**
 4 A. I don't know. From what you are just telling me
 5 now it just happened just recently with Oleg.
 6 **Q. Right, but has that ever happened with anybody**
 7 **else?**
 8 A. I couldn't -- I don't recall. I'm certain it
 9 has, but I don't remember.
 10 MR. WINGER: Okay. I don't have any other
 11 questions.
 12 Got anything else?
 13 MR. GROYSMAN: No, that's it.
 14 MR. WINGER: Read or waive?
 15 THE WITNESS: Don't matter. Really you didn't
 16 have any questions.
 17 (Off the record at 2:49 p.m.)
 18 (An off-the-record discussion was held.)
 19 (Back on the record at 2:50 p.m.)
 20 MR. GROYSMAN: Let's go back on the record real
 21 quick.

22 REDIRECT EXAMINATION

23 BY MR. GROYSMAN:

24 **Q. Detective, I'm sorry, one final question. You**
 25 **brought your documents here with you today?**

35

1 to be and we contacted Aventura Police Department and they
 2 weren't interested. So then contacted the State
 3 Attorney's Office and Mr. Kastruski got involved and he
 4 went over there and he found out that the funds wasn't
 5 what Oleg suggested where he got his money from, so he did
 6 a warrant.
 7 I don't understand the technical part of it
 8 because they did what they did. I didn't really open that
 9 investigation up on that.

10 **Q. Okay. Are you aware that the State Attorney's**
 11 **Office eventually dropped all the charges against Oleg**
 12 **Firer?**

13 A. No, I'm not aware of that, no.

14 **Q. Are you aware that Oleg Firer's criminal record**
 15 **has been expunged?**

16 A. No, I'm not aware of that.

17 MR. GROYSMAN: Is it expunged or sealed?

18 MR. WINGER: Expunged.

19 THE WITNESS: With the drop they wouldn't tell me
 20 because it wasn't my investigation.

21 BY MR. WINGER:

22 **Q. Okay. Have you ever arrested somebody on behalf**
 23 **of the State Attorney's Office where the State Attorney's**
 24 **Office subsequently drops the charges against that**
 25 **individual?**

37

1 A. Yes.
 2 **Q. What is that document?**
 3 A. That is the Incident Report 2006-1018-35.
 4 **Q. Is this a fair and accurate copy of the original**
 5 **that's in the report?**
 6 A. Yes.
 7 **Q. Has anything been altered or deleted from this**
 8 **copy from the original?**
 9 A. No.
 10 **Q. How did you obtain this?**
 11 A. I printed it at the station.
 12 **Q. You got it off your business records?**
 13 A. Yes.
 14 **Q. Was this incident report prepared in the normal**
 15 **course of your investigative business?**
 16 A. Yes.
 17 MR. GROYSMAN: Thank you. Can we just mark this
 18 as Plaintiff's A.
 19 (Plaintiff's Exhibit A was marked for
 20 identification by the court reporter.)
 21 (The deposition was concluded at 2:51 p.m.)
 22 (Reading and signing of the deposition was waived
 23 by the witness and all parties.)
 24

25